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CHANGE LOG

Revision	Date	Change
01	12/23	Initial Draft
02	03/25	Policy Update

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1. AIR EUROPA HOLDING INTERNAL REPORTING SYSTEM AND WHISTLEBLOWER PROTECTION POLICY

Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption (hereinafter, Law 2/2023) transposes into Spanish law Directive 2019/1937 of the European Parliament and of the Council, of October 23, 2019, on the protection of persons who report breaches of Union law. The Directive uses the term “whistleblower,” and Law 2/2023 has opted for the designation

“informant,” and, consequently, this is the term also used in this document by Air Europa Holding (hereinafter, “Air Europa” or “the organization”) and its constituent companies (Air Europa Holding, Air Europa Líneas Aéreas, Aeronova, and Air Europa Suma Miles).

Law 2/2023 explains and clarifies in its preamble that its purpose is to protect, against possible retaliation, individuals who, in a work or professional context, detect serious or very serious criminal or administrative violations and report them through the mechanisms set forth in the law.

In accordance with Law 2/2023, the organization, as a regulated entity, must have a designated channel for receiving and handling reports regarding the violations covered by the law, known as the “Internal Reporting System” or Ethics Channel. Furthermore, the law requires the adoption of a policy establishing the general operating principles of the system and protective measures for whistleblowers; therefore, Air Europa Holding has approved the Policy on the Internal Reporting System and Whistleblower Protection (hereinafter, the Policy).

Furthermore, this Policy is part of the culture of compliance established within our organization.

The Board of Directors of Air Europa promotes and approves this Policy, thereby fulfilling its role of establishing the necessary foundations for the proper and efficient management of the Internal Reporting System and promoting compliance with the principles and safeguards set forth in this Policy.

2. PRINCIPLES GOVERNING AIR EUROPA’S ACTIONS IN IMPLEMENTING THE INTERNAL WHISTLEBLOWER INFORMATION AND PROTECTION SYSTEM

The basic principles of conduct upon which this Policy is based are as follows:

- **Regulatory Compliance:** Legal compliance and corporate ethics are integral pillars of the System. Therefore, communications will be handled with integrity and professionalism, in compliance with applicable laws, internal regulations, and, in particular, data protection regulations.
- **Independence and impartiality:** The System will guarantee an impartial hearing and fair treatment for all persons involved. All persons participating in the proceedings will act in good faith in the pursuit of the truth and the clarification of the facts.
- **Transparency and accessibility:** Care will be taken to ensure that information about the System and its regulations is communicated clearly and comprehensibly, as well as to ensure the

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System's publicity and accessibility.

- **Traceability and security:** The System will incorporate all necessary measures to ensure the integrity, tracking, and security of the information.
- **Confidentiality and Anonymity:** The System will guarantee anonymity and, in all cases, the utmost confidentiality regarding the identity of the whistleblower, the information reported, and the actions taken in managing and processing such information. Furthermore, the System will allow for the submission of anonymous reports.
- **Confidentiality:** The System will ensure that individuals involved in the processing and investigation of communications act with the utmost discretion regarding the facts they learn by virtue of their position or role.
- **Diligence and Speed:** The System will ensure that the investigation and resolution of reported incidents are handled with due professionalism and diligence and without undue delay, so that the proceedings can be completed in the shortest possible time while respecting due process.
- **Good faith:** The System will ensure that information is communicated honestly, with integrity, and truthfully, notwithstanding any inaccuracies or omissions that the informant may unintentionally make.
- **Respect for and protection of individuals:** The System will ensure that appropriate measures are taken to guarantee the right to protection of the dignity and privacy of the individuals concerned.
- **Respect for fundamental rights:** The System guarantees the right to information, the right to privacy and data protection, the right to a defense, the right to be heard, the right to the presumption of innocence, and the right to honor for all persons involved in the proceedings. Furthermore, these persons have the right to be heard at any time, in the manner deemed appropriate, to ensure the successful conclusion of the investigation.
- **Principle Prohibiting Retaliation or Adverse Action Against the Whistleblower**
- **Principle of Objectivity, Neutrality, and Integrity**

The principles underlying this Policy apply to all entities that make up AIR EUROPA.

In implementing the Internal Whistleblower Reporting and Protection System, Air Europa designates the Compliance Officer as the System Manager, which enables cases to be resolved quickly while ensuring continuous operation, an objective and multidisciplinary review of the information, and compliance with legally established deadlines.

Air Europa will ensure, through the independent actions of the System Administrator, the completeness, integrity, and confidentiality of the information; the prevention of unauthorized access; the long-term storage of the information; the comprehensive protection of the whistleblower; and respect for good faith. To this end, in addition to the provisions of this document, the aforementioned principles will be incorporated into the information management procedure required by Law 2/2023, which the System Administrator must follow when reviewing the information received. Access to the Ethics Channel or Internal Reporting System is public and available via the following link:

<http://aireuropa.canaletico.es/>

Air Europa will also ensure, by respecting the independent role of the System Manager, objectivity and impartiality in the review of the information received; it will avoid conflicts of interest; it will respect the presumption of innocence; and

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guarantee the right to a defense. These principles will also be reflected in the information management procedure, which is public and available on Air Europa's website.

Air Europa ensures access to the internal whistleblower reporting and protection system through an external technology platform, the purpose of which is to receive, process, record, and retain the actions taken as a result of reports submitted by whistleblowers.

3. PERSON RESPONSIBLE FOR AIR EUROPA'S INTERNAL REPORTING SYSTEM

The Head of the Internal Reporting System (hereinafter, RSII or System Head) is the Compliance Officer.

The RSII may delegate the authority to manage and conduct investigative proceedings to a member of the Compliance Department, who shall be considered a delegated manager.

In the performance of their duties, neither the RSII nor the person designated by the RSII shall receive instructions from any superior at Air Europa, nor are they subject to any external hierarchy of said collegiate body, nor may they be removed from their positions for matters related to their legitimate participation in the Internal Reporting System. Therefore, they must perform their duties independently, impartially, and autonomously, with the executive authority to decide on the actions to be taken upon learning of evidence of any alleged criminal act that may have criminal consequences or any other type of consequences for the Organization. Likewise, the Compliance Officer has the authority to report alleged criminal acts to the Board of Directors whenever deemed necessary and, in any case, when such acts could seriously affect the Organization's reputation or Air Europa's corporate interests.

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4. CREATION OF THE AIR INTERNAL REPORTING CHANNEL EUROPA

Air Europa has established an internal channel to receive reports and communications (hereinafter, "CII") regarding acts or omissions that may constitute a serious or very serious criminal or administrative offense, as well as other actions provided for in Article 2 of Law 2/2023, which are listed in Section 5.2. The scope of this document includes all such situations, as well as any situations that violate Air Europa's Code of Ethics, its Anti-Corruption Policy, or any other applicable internal or external regulations.

The channel is administered by the RSII. Access to this channel will be limited, within the scope of their responsibilities and duties, to:

- The System Manager (Compliance Officer) and the designated manager.
- The Director of Human Resources or a duly designated person from that department, only when disciplinary action against an employee may be warranted.
- The external investigating expert, if applicable.
- The Data Protection Officer.
- The head of the organization's legal department or the person performing those functions internally, should it be necessary to take legal action in connection with the facts described in the report.

The CII must technically ensure the confidentiality or, if necessary, the anonymity of the whistleblower, to protect them from any leaks and subsequent retaliation to which they may be subjected.

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5. WHO CAN BE A WHISTLEBLOWER, AND WHAT KIND OF INFORMATION IS COVERED BY AIR'S INTERNAL REPORTING SYSTEM EUROPA?

5.1 Scope Subjective

Any person who has an employment or professional relationship with Air Europa may use the internal reporting channel and benefit from the protection afforded by Law 2/2023 as a whistleblower to report information regarding the acts or omissions described in Article 2 of Law 2/2023. This employment or professional relationship, which entails a dependency on Air Europa, is what makes special protection against possible retaliation necessary and appropriate.

In any case, for the purposes of Law 2/2023, the following are considered whistleblowers for Air Europa:

- a) Individuals who are employees of Air Europa.
- b) Self-employed individuals who currently carry out, or have previously carried out, professional activities with Air Europa.
- c) Shareholders, partners, and members of Air Europa's administrative, management, or supervisory bodies, including non-executive members.
- d) Any person who works for or under the supervision and direction of Air Europa's contractors, subcontractors, and suppliers.
- e) Whistleblowers who publicly report or disclose information regarding violations obtained in the course of an employment or statutory relationship with Air Europa that has already ended, as well as volunteers, interns, and trainees—regardless of whether they receive compensation—and those whose employment relationship has not yet begun, in cases where the information regarding violations was obtained during the selection process or pre-contractual negotiations.

5.2 Scope Purpose

With regard to the subject matter of the information, natural persons who report any of the following matters are protected:

- a) Any acts or omissions that may constitute violations of European Union law, provided that:
 1. (1) Fall within the scope of the European Union acts listed in the annex to Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019, on the protection of persons who report breaches of Union law, regardless of how such acts are classified under domestic law;
 2. (1) Affect the financial interests of the European Union as set forth in Article 325 of the Treaty on the Functioning of the European Union (TFEU); or
 3. ⁹ Affect the internal market, as provided for in Article 26(2) of the TFEU, including violations of European Union competition rules and rules on state aid, as well as violations relating to the internal market in connection with acts that violate corporate income tax rules or practices intended to obtain an advantage

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a tax violation that undermines the purpose or intent of the legislation applicable to corporate income tax.

b) Acts or omissions that may constitute a serious or very serious criminal or administrative offense. In any case, this shall be understood to include all serious or very serious criminal or administrative offenses that result in financial loss to the Treasury and the Social Security system.

Furthermore, as set forth in Law 2/2023 itself, cases governed by specific regulations are excluded from the law's material scope of application; that is, regulations governing the mechanisms for reporting violations and protecting whistleblowers as provided for by sector-specific laws or by the European Union instruments listed in Part II of the Annex to Directive (EU) 2019/1937.

Matters relating to possible instances of harassment, regardless of their nature and given their criminal nature and the potential implications for the company's criminal liability, will be handled in accordance with Air Europa's existing Harassment Protocol, following the deadlines specified in said Protocol. Similarly, the team responsible for implementing the Harassment Protocol must maintain constant communication with the System Manager, to whom it must report in writing on all matters related to the case, from its initiation through its closure.

Furthermore, this internal communication channel is not the appropriate venue for expressing dissatisfaction or disagreement with the policies established by Air Europa in the legitimate exercise of its functions. Nor is it the appropriate venue for reporting on equal employment opportunities, labor disputes, or employee complaints related to issues such as work schedules, vacation time, salaries, etc. These matters should be referred to the People or Human Resources department, which is responsible for handling them.

Finally, any customer complaints will not be handled through this internal channel either; instead, they will be forwarded to the Customer Service department of the relevant division for resolution, with the understanding that the System Administrator is not responsible for these matters.

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6. -PERSONAL DATA PROTECTION

The processing of personal data resulting from the implementation of Law 2/2023 shall be governed by the provisions of the GDPR and Organic Law 3/2018, of December 5, on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDPGDD).

The internal reporting system prevents unauthorized access, protects the identity of, and ensures the confidentiality of data pertaining to the individuals concerned and any third parties mentioned in the information provided—particularly the identity of the whistleblower, if he or she has been identified. The identity of the whistleblower may only be disclosed to the judicial authority, the Public Prosecutor's Office, or the competent administrative authority in the context of a criminal, disciplinary, or sanctioning investigation, and such cases shall be subject to the safeguards established in the applicable regulations.

Under no circumstances will personal data that is not necessary for the investigation of acts or omissions be subject to relocation or processing; such data will be immediately deleted, as appropriate. Likewise, all personal data that may have been disclosed and that relates to conduct not covered by the scope of the Whistleblower Protection Act will be deleted.

If the information received contains special categories of personal data subject to special protection, it will be immediately deleted, unless the processing is necessary for reasons of substantial public interest in accordance with the provisions of Article 9.2.g) of the GDPR, as provided for in Article 30.5 of Law 2/2023.

In any case, personal data whose relevance to the processing of specific information is not evident will not be collected; if such data is collected by accident, it will be deleted without undue delay.

Communications that have not been acted upon may only be retained in anonymized form, and the blocking obligation provided for in Article 32 of the LOPDPGDD shall not apply.

The data subject to processing may be retained in the information system only for as long as is strictly necessary to determine whether to initiate an investigation into the reported facts. If it is established that the information provided, or part thereof, is untrue, it must be immediately deleted as soon as such a circumstance is confirmed, unless such falsehood constitutes a criminal offense, in which case the information will be retained for as long as necessary while the legal proceedings are ongoing.

In any case, if three months have elapsed since the receipt of the report without any investigative proceedings having been initiated, the data must be deleted, unless the purpose of retention is to provide evidence of the system's operation. Reports that have not been acted upon may only be retained in anonymized form.

The maximum data retention period in any case is 10 years.

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7. MEASURES FOR PROTECTION FOR WHISTLEBLOWER AND PERSONS AFFECTED

7.1 Acts Constituting Retaliation

Acts constituting retaliation, including threats of retaliation and attempts at retaliation against individuals who file a good-faith report in accordance with the law, are expressly prohibited.

Retaliation is defined as any act or omission that is prohibited by law, or that, directly or indirectly, constitutes unfavorable treatment that places those who suffer it at a particular disadvantage compared to others in the workplace or professional context, solely because of their status as whistleblowers or because they have made a public disclosure.

For the purposes of Law 2/2023, and by way of example, retaliation is considered to include actions taken in the form of:

- a) Suspension of the employment contract, dismissal, or termination of the employment or statutory relationship, including non-renewal or early termination of a temporary employment contract after the probationary period has ended, or early termination or cancellation of contracts for goods or services; the imposition of any disciplinary measure; demotion or denial of promotions; and any other substantial modification of working conditions; and the failure to convert a temporary employment contract into a permanent one, if the employee had legitimate expectations that he or she would be offered permanent employment; unless these measures are carried out within the regular exercise of managerial authority under labor law or the relevant regulations governing the status of public employees, due to proven circumstances, facts, or violations, and unrelated to the filing of the notice.
- b) Intimidation, harassment, or ostracism.
- c) Negative evaluations or references regarding work or professional performance.
- d) Inclusion on blacklists or the dissemination of information within a specific sector that hinders or prevents access to employment or the awarding of contracts for work or services.
- e) Denial or revocation of a license or permit.
- f) Denial of training.
- g) Discrimination, or unfavorable or unfair treatment.

All of the foregoing applies, unless these measures are taken in the regular exercise of managerial authority under labor law, due to proven circumstances, events, or violations, and unrelated to the filing of the notice.

In the event of retaliation, the Head of the Internal Reporting System must be notified immediately. The System Manager will conduct an investigation and periodically monitor the situation of the whistleblower and, where applicable, of those individuals covered by the protection program. If the System Manager determines that, during the term of the protection program, retaliation, stigmatization, or harassment has occurred, in addition to any disciplinary measures and/or administrative sanctions that may apply to the

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In such cases, the necessary and available measures shall be taken to restore the victim of reprisals to the situation they were in prior to the harm suffered.

Any person whose rights have been infringed upon as a result of such communication or disclosure after the two-year period has elapsed may request protection from the competent authority, which, in exceptional and justified cases, may extend the period of protection, after hearing the persons or bodies that may be affected.

Administrative acts intended to prevent or hinder the submission of reports and disclosures, as well as those that constitute retaliation or result in discrimination following the submission of such reports and disclosures under Law 2/2023, shall be null and void and shall give rise, where appropriate, to disciplinary or liability measures, which may include the payment of damages to the aggrieved party.

7.2 Measures to protect whistleblowers from retaliation

Persons who report information regarding the acts or omissions set forth in paragraph 3, or who make a public disclosure in accordance with Law 2/2023, shall not be deemed to have violated any restriction on the disclosure of information and shall not incur any liability whatsoever in connection with such report or public disclosure, provided that they had reasonable grounds to believe that the communication or public disclosure of such information was necessary to reveal an act or omission under that law, all without prejudice to the provisions of the specific protection rules applicable in the workplace. This measure shall not affect criminal liabilities.

The provisions of the preceding paragraph apply to the disclosure of information by workers' representatives, even if they are subject to legal obligations of confidentiality or non-disclosure of confidential information. All of this is without prejudice, likewise, to the specific protection rules applicable in the workplace.

Whistleblower protection measures shall also apply, where appropriate, to:

- 1) individuals who, within the framework of Air Europa, assist the company in the process;
- 2) individuals who are connected to the whistleblower and who may face retaliation, such as the whistleblower's coworkers or family members; and
- 3) a legal entity for which the person works or with which the person has any other type of relationship in a work context, or in which the person holds a significant interest. For these purposes, an interest in the capital or in the voting rights corresponding to shares or equity interests is considered significant when, due to its proportion, it allows the person holding it to exert influence over the legal entity in which the interest is held.

Informants shall not be held liable for obtaining or accessing information that is publicly communicated or disclosed, provided that such obtaining or accessing does not constitute a crime.

Any other potential liability of whistleblowers arising from acts or omissions that are not related to the reporting or public disclosure, or that are not necessary to disclose a violation under Law 2/2023, shall be enforceable in accordance with applicable regulations.

In proceedings before a court or other authority concerning damages suffered by whistleblowers, once the whistleblower has reasonably demonstrated that has disclosed or has made a public disclosure of

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In accordance with Law 2/2023, if a person has suffered harm, it shall be presumed that the harm occurred in retaliation for reporting or making a public disclosure. In such cases, the person who took the harmful action shall bear the burden of proving that the action was based on duly justified grounds unrelated to the report or public disclosure.

In legal proceedings, including those involving defamation, copyright infringement, breach of confidentiality, violation of data protection laws, disclosure of trade secrets, or claims for damages based on the

Under labor or statutory law, whistleblowers shall not incur any liability whatsoever as a result of communications or public disclosures protected by Law 2/2023. Such persons shall have the right to assert, in their defense and within the framework of the aforementioned legal proceedings, that they made a communication or public disclosure, provided they had reasonable grounds to believe that the communication or public disclosure was necessary to bring to light a violation under Law 2/2023.

7.3 Measures to protect those affected

During the processing of the case file, the individuals affected (under investigation) by the report shall have the right to the presumption of innocence, the right to a defense, and the right to access the case file under the terms set forth in Law 2/2023, as well as the effective protection of their rights. The person under investigation shall be entitled to the same protection afforded to whistleblowers, with their identity protected and the confidentiality of the facts and details of the proceedings guaranteed. The presumption of innocence and the right to honor and privacy of the affected person shall be guaranteed at all times and under all circumstances.

Individuals who have been reported through the Channel may never be penalized based solely on a report; in all cases, the accuracy of the report must first be verified, and the individuals involved must be given the opportunity to provide an explanation regarding the reported situation.

In order to guarantee the right of defense of the affected individual, that person may be heard at a time determined by the Organization, and will be informed of the possibility of appearing with legal counsel and of presenting such evidence as they deem appropriate and relevant.

8. MANAGEMENT OF INFORMATION RECEIVED BY THE OFFICIAL RESPONSIBLE FOR THE INTERNAL INFORMATION SYSTEM OF AIR EUROPA

Information may be reported to Air Europa anonymously. Otherwise, the identity of the informant will be kept confidential and will be known only to Air Europa's RSII and the person designated by the RSII.

Information will be reported through the ethics channel available via the following link: <http://aireuropa.canaletico.es/>, accessible from the Air Europa website, as well as via email atcanaletico@aireuropa.com. The online platform allows for both written and verbal reports. Any information received by Air Europa through any other means that relates to the scope of Law 2/2023 will be forwarded to the ethics channel administered by the Head of Air Europa's Internal Reporting System.

At the informant's request, the report may also be submitted in person, via videoconference, or by telephone to the RSII or a designated representative from the Compliance Department, and such communication must take place within a maximum of seven days.

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Where applicable, the informant will be notified that the communication will be recorded and will be informed of how their data will be processed in accordance with the provisions of the GDPR and the LOPDPGDD.

When submitting the information, the informant must provide a mailing address, email address, or secure location for the purpose of receiving notifications, unless the informant expressly waives the right to receive any communication regarding actions taken by the RSII as a result of the information.

In the case of verbal communications, including those made during in-person meetings, the RSII must document them in one of the following ways:

- a) By recording the conversation in a secure, durable, and accessible format, or,
- b) through a complete and accurate transcript of the conversation prepared by the staff responsible for processing it.

Without prejudice to the rights to which the informant is entitled under personal data protection regulations, the informant will be given the opportunity to review, correct, and sign to confirm the accuracy of the transcript.

Once the information has been submitted, it will be entered into the information management system by assigning an identification code. This information will be stored in a secure database with access restricted exclusively to duly authorized Air Europa RSII personnel, where all received communications will be recorded with the following details:

- a) Date of receipt
- b) Identification code
- c) Actions taken
- d) Measures taken
- e) Closure date

Upon receipt of the information, within a period not exceeding 7 calendar days from such receipt, an acknowledgment of receipt will be sent to the whistleblower, unless the whistleblower has expressly waived the right to receive communications regarding the investigation or Air Europa's RSII reasonably determines that acknowledging receipt of the information would compromise the protection of the whistleblower's identity.

Once the information has been recorded, the RSII will proceed to assess its admissibility in accordance with the substantive and personal scope set forth in Articles 2 and 3 of Law 2/2023. The resolution of the investigation may not exceed three months from the date of the acknowledgment of receipt of the report or, if no acknowledgment of receipt was sent to the Whistleblower, three months from the expiration of the seven-day period following the submission of the report, except in cases of particular complexity, in which the investigation may be extended for up to an additional three months.

Likewise, all members of the Organization's stakeholder groups have access to regional, national, and European external reporting channels, including the Independent Whistleblower Protection Authority (A.A.I.), in accordance with Law 2/2023. However, the internal reporting channel is established as the preferred means for reporting potential violations, ensuring effective and confidential handling.

9. TRAINING, , AND DISSEMINATION

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The content of this policy will be included among the training topics related to AIR EUROPA's criminal risk prevention training plan, as well as in any additional outreach activities that may be determined from time to time.

This Policy, which forms part of Air Europa's Compliance System, will be published on Air Europa's corporate website and on the corporate intranet. It will also be sent to all employees of the companies listed and communicated, to the extent applicable, to third parties with whom Air Europa does business.

In any case, the admission process and subsequent actions will be carried out in accordance with the information management procedure adopted for this purpose by Air Europa.

10. R DISCIPLINARY POLICY

Failure to comply with the provisions of this policy may result in the imposition of disciplinary sanctions (including disciplinary dismissal) or in appropriate actions depending on the relationship the offending individual has with AIR EUROPA.

11. APPROVAL, PUBLICATION, AND ENTRY INTO FORCE OF THE POLICY

The Board of Directors, as Air Europa's highest governing body, is responsible for implementing the Internal Reporting System and overseeing this Policy.

This Policy was approved by Air Europa's governing body on October 25, 2023, and takes effect immediately; it will remain in effect until any amendments are made, which will be duly communicated.

This Policy will be reviewed, updated, approved, and disseminated on a regular basis and whenever changes are necessary. Any changes made will also be published on the Air Europa website.

Once approved by Air Europa's governing body, it will be implemented through a system management procedure and communication channels.

12. INTERPRETATION OF THIS POLICY

The provisions of this Policy constitute the minimum standards applicable to all companies in which Air Europa Holding holds a majority stake, without prejudice to applicable law. The Principles and Guarantees are intended as interpretive guidelines. However, in the event of a conflict between this Policy and applicable law, the law shall always prevail.